

Michael J. Gayan, Esq. (#11135)
m.gayan@kempjones.com
Laura E. Rios, Esq. (#15990)
l.rios@kempjones.com
KEMP JONES, LLP
3800 Howard Hughes Parkway, 17th Floor
Las Vegas, NV 89169
T: (702) 385-6000 / F: (702) 385-6001

David J. Tsai (PHV)
david.tsai@pillsburylaw.com
John Steger (PHV)
john.steger@pillsburylaw.com
PILLSBURY WINTHROP SHAW PITTMAN LLP
Four Embarcadero Center, 22nd Floor
San Francisco, CA 94111-5998
T: (415) 983-1000 / F: (415) 983-1200

Attorneys for Plaintiff and Counter-Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WELK BIOLOGY CO., LTD.,

Plaintiff,

vs.

HAKUMO LLC,

Defendant.

HAKUMO LLC,

Counterclaimant,

vs.

WELK BIOLOGY CO., LTD.; JWAY FOODS
LLC; YUNG-HSIANG "JERRY" LIN; CHIEN-
TSE "JACK" CHENG; and JENNIFER HUANG,
Counter-Defendants.

CASE NO. 2:24-CV-01613-APG-NJK

**STIPULATION FOR EXTENSION
OF TIME FOR DEFENDANT AND
COUNTERCLAIMANT HAKUMO
LLC TO RESPOND TO COUNTER-
DEFENDANTS' MOTIONS TO
DISMISS**

(FIRST REQUEST)

Welk Biology Co., Ltd., JWAY FOODS LLC, Yung-Hsiang "Jerry" Lin, Chein-Tse "Jack"
Cheng, and Jennifer Huang ("Counter-defendants") and Defendant and Counterclaimant Hakumo
LLC ("Hakumo") (collectively, the "Parties") by and through their respective counsel, hereby agree

1 and stipulate to extend the deadline for Hakumo to respond to the Counter-defendants' motions to
2 dismiss to January 20, 2025. In turn, Counter-defendants' reply briefs will be due on February 3,
3 2025.

4 This stipulation is entered into due to the Christmas, New Years, and Chinese New Years
5 holidays. No previous extensions have been requested by the Parties with respect to the response
6 date for these motions to dismiss, and the Parties assert that good cause exists for the extension and
7 that the extension is not sought for purposes of delay.

8 Dated: December 17, 2024.

Respectfully submitted,

9 **PILLSBURY WINTHROP SHAW PITTMAN LLP**

10 By: /s/ David J. Tsai
11 David J. Tsai (*pro hac vice*)

12 Attorneys for Plaintiff and Counter-Defendants
13 WELK BIOLOGY CO., LTD.
14 JWAY FOODS LLC, Yung-Hsiang "Jerry" Lin,
Chien-Tse "Jack" Cheng and Jennifer Huang

15 Dated: December 17, 2024.

McDONALD CARANO LLP

16 By: /s/ Kristen T. Gallagher
17 Kristen T. Gallagher (NSBN 9561)
18 Adrienne Brantley-Lomeli (NSBN 14486)
2300 West Sahara Avenue, Suite 1200
19 Las Vegas, NV 89102
kgallagher@mcdonaldcarano.com
abrantley@mcdonaldcarano.com

20 Troy J. Hutchinson (PHV)
21 ROCKHUTCHINSON
120 South Sixth Street, Suite 2480
22 Minneapolis, MN 55402
thutchinson@rockhutchinson.com

23 Attorneys for Defendant and Counterclaimant
24 HAKUMO LLC

25 IT IS SO ORDERED:

26 
27 CHIEF UNITED STATES DISTRICT JUDGE

28 DATED: December 18, 2024